



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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April 30, 2012

Mr. James Winkler, President  
Millersburg Town Council  
P.O. Box 278  
Millersburg, IN 46543

Dear Mr. Winkler:

Re: Millersburg Water Department  
Certified Operator  
PWSID# 5220015

Your letter to Thomas Easterly, Commissioner, regarding changes to your public water system and a request for a waiver from certified operator requirements was forwarded to me for response. IDEM has noted the changes to your system and the reclassification of your facility from a WT 2 to a WT 3 based on the addition of filtration equipment. Indiana rules require owners or governing bodies of public water systems to place them under the direct supervision of an operator that is in responsible charge and is properly certified at the appropriate level. We are pleased to hear that you are employing a WT 3 operator. We would appreciate it if you forward the name and contact information for the operator in responsible charge.

Regarding your question about reducing the number of visits for the certified operator in responsible charge of your system, IDEM believes it is important for the operator in responsible charge to have an on-site presence. The operator in responsible charge is the person IDEM considers accountable for operating the system in full compliance with State and Federal requirements. We believe that a reduction in site visits is premature at this time because it is not clear that your updated water system will receive adequate supervision by an appropriately licensed operator. We do understand that Mr. Eldridge is taking steps to become a WT 3 operator. Based on our records Mr. Eldridge is scheduled to take the operator certification exam on for the second time on May 3, 2012. You should be aware that Mr. Eldridge, along with successfully passing the exam, must meet the following criteria from the Operator Certification Rule, 327 IAC 8-12-3.2 (c), before he becomes a WT 3 operator and can be placed in responsible charge of your system:

(3) Grade WT 3 is a certified operator qualified to operate a Class WT 1, Class WT 2, and Class WT 3 water treatment plant and a Class DSS water distribution system at a nontransient noncommunity water system serving five hundred (500) or fewer

individuals or a community water system serving one hundred (100) or fewer individuals after having fulfilled the following requirements:

- (A) Possess a high school diploma or its equivalent.
- (B) Meet the qualifications of section 3 of this rule.
- (C) Must be able to do the following:
  - (i) Maintain inventories.
  - (ii) Order supplies and equipment.
  - (iii) Interpret chemical and bacteriological sample reports.
- (D) Attain the following acceptable work experience at a minimum:
  - i) Two (2) years in the operation of a Class WT 3 water treatment plant.
  - (ii) Successful completion of educational work at college level in:
    - (AA) engineering;
    - (BB) chemistry; or
    - (CC) science;

related to water treatment may be substituted for work experience required according to item (i) at the ratio of four(4) semesters or six (6) quarters of schooling for a maximum substitution of one (1) year of experience.

IDEM is willing to evaluate a reduction in site visits if and when Mr. Eldridge passes the examination and becomes a WT 3, Operator in Training. Operator in Training is a classification for individuals that can pass the exam and meet all requirements of the rule except the necessary amount and level of experience to qualify as a WT 3. Mr Eldridge also needs to gain some experience operating your updated treatment plant, and IDEM feels that at least six months or more experience is proper. At that point if the Town wishes to pursue a reduction in site visits by the operator in responsible charge, you can submit a proposal that details how your water system will operate in compliance with applicable rule requirements. Two key elements that must be addressed in your proposal include a discussion of how the operator in responsible charge is available to make process control decision about water quality or quantity that affect public health and an assurance that at least one properly certified operator at the WT 3 level is available for each shift your plant is in operation. IDEM will evaluate whether the operator in responsible charge is providing necessary oversight of the plant especially during critical times such as filter backwashing, periods of high demand and during essential maintenance activities. It also is important that operator in responsible charge be on-site a sufficient amount of time to verify that Mr. Eldridge is receiving acceptable experience in the operation of a WT 3 water system so that he may become a WT 3 operator.

If have additional questions or wish to discuss this matter further, please contact Mr. Patrick Carroll at (317) 232-8741 or at the address above.

Sincerely,



Bruno Pigott  
Assistant Commissioner  
Office of Water Quality

bcc: Sherri Winters  
Bill Morgan  
Pat Carroll